

REMARKS

Claims 1-45 were pending in this application. Claims 46-48 have been newly added. No claims have been canceled. Hence, claims 1-48 are now pending in this application.

Independent claims 1 and 14 were amended to clarify that the applications are software applications, each software application running on a separate system/platform, and that the components are integration components that facilitate the transfer of data having different formats and/or data types between the software applications. Independent claims 28 and 37 were also amended to clarify that the applications are software applications, each application having a different data format and/or data type, and that the components are integration components that facilitate the transfer of data between the software applications. Support for the amendments may be found throughout the specification in general and at least on page 6, line 15 to page 7, line 22.

Dependent claims 3-6, 8-10, 12, 17-20, 22-26, 29-30, 32-35, 38-39, 41-42, and 44-45 were amended in order to align these claims with their respective independent claims as a result of the amendments to the independent claims.

Dependent claims 13, 24, 36, 43, and 46 were amended/added in order to more fully claim the invention. Support for the amendments may be found throughout the specification in general and at least on page 9, lines 13-14 and FIG. 6.

Dependent claims 47 and 48 were added in order to capture the subject matter removed by amendment from independent claims 28 and 37, respectively.

No new matter was added as a result of the amendments to the claims.

Rejections

Claims 1-6, 8-20, 22-30, 32-39, and 41-45 were rejected under 35 U.S.C. 102(b) as being anticipated by U.S. Patent No. 5,991,536 (Brodsky). These rejections are respectfully traversed.

Allowable Subject Matter

Applicants wish to thank the Examiner for the indication of allowable subject matter in claims 7, 21, 31, and 40. These claims were objected to as being dependent on a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims.

Summary of Interview

Applicants also wish to thank the Examiner for the courtesy of a telephonic interview on August 25, 2005. During said interview, the Examiner explained the construction of various claim terms, including the terms “components,” “applications,” and “responsible party,” and the reasons why the Examiner believes Brodsky discloses these claim terms. Although Applicants disagree with the Examiner’s interpretation of these terms, as stated during the interview, Applicants are grateful to the Examiner for making the time for the interview.

Arguments in Support of the Claims

As an initial matter, Applicants note that the Office Action lists the wrong version of the claims. The original claims were amended in a Preliminary Amendment filed June 5, 2003, which included a listing of all the claims. A courtesy copy of these claims was provided to the Examiner in a response filed December 13, 2004, even though no further claim amendments were made at that time. Accordingly, Applicants’ remarks below relate to the subsequently amended claims and not the original claims.

Secondly, Applicants respectfully remind the Examiner that in accordance with the recent *en banc* Federal Circuit decision in *Phillips v. AWH Corp.*, 75 USPQ2d 1321 (Fed. Cir. 2005), the Examiner must consider the claims in light of the claim language, the specification, and the prosecution history. *Id.* at 1326 (citing *Gemstar-TV Guide Int’l, Inc. v. Int’l Trade Comm’n*, 383 F.3d 1352, 1364 (Fed. Cir. 2004)). It is improper for the Examiner to construe the claim terms in a manner that is inconsistent with the meaning given to those terms in the specification and the prosecution history.

Based on the above guidance from the court, Applicants respectfully disagree that Brodsky discloses or suggests the invention as claimed in the currently pending claims. For example, the specification uses the term “application” to refer to disparate and distributed internal applications and external applications, processes, business partners, Web-based applications, decision support systems, and the like. (See, e.g., page 6, lines 15-18.). During the interview of August 25, 2005, however, the Examiner took the position that an “application” may be an object of an object-oriented application. Applicants respectfully submit that such a construction is an overly broad interpretation of the claim term “application” and is inconsistent with the claim language, the specification, and the prosecution history.

Nor does Brodsky disclose or suggest implementing a change in the integrated applications environment based on **feedback** from the parties responsible for the components and applications, as recited in dependent claim 2 (and claims 15, 28, and 37). On page 2 of the Office Action, the Examiner states that the ability to “validate” a model using the Brodsky modeling tool constitutes disclosure of the feedback-based implementation aspect of this claim. However, the term “validate” simply means to check or prove the validity of something. (See, e.g., Oxford Concise Dictionary, 10th edition.) There are many ways to check or prove the validity of something without providing feedback (particularly if the validation is successful). This is clear from the absence in Brodsky of any mechanism for providing such feedback. On the contrary, Brodsky states in column 1, lines 55-58, that the modeling tool is intended merely to provide notification of a change and to do so only after the change has **already been implemented**.

Nor does Brodsky disclose or suggest notifying the parties responsible for the components and applications only if the change in the integrated applications environment affects the components and applications in a **predefined manner**, as recited in dependent claim 12 (and 23, 35, and 42). Indeed, there does not appear to be any way in Brodsky to discriminate between different types of changes for which notification may occur. On the contrary, Brodsky states that notification simply occurs **whenever** a change is made. (See, e.g., column 4, lines 49-60.)

Nor does Brodsky disclose or suggest that the components of the integrated applications environment include data sources, data destinations, data templates, data maps, data schedules, conversion formulas, filters, and business rules, as recited in dependent claim 5 (and 19, 29, and 38). Based on the comments in the Office Action, the Examiner seems to have misinterpreted this claim, focusing instead on the “rules” that are used by the Notification Manager to determine which objects (or components, allegedly) will be notified. A correct interpretation of the claim would require the objects, **not the Notification Manager**, to include data sources, data destinations, data templates, data maps, data schedules, conversion formulas, filters, and business rules. Nowhere does Brodsky disclose or suggest such a result.

Nor does Brodsky disclose or suggest that the components of the integrated applications environment may be composed of metadata, much less comparing an old set of metadata with a new set of metadata, as recited in dependent claim 6 (and 20, 30, and 39). Indeed, a simple word search reveals that **the term “metadata” does not appear anywhere in Brodsky**.

Nevertheless, in an effort to expedite the prosecution of this application, Applicants have amended independent claims 1 and 14 to clarify that the integrated applications environment includes a plurality of software applications running on **multiple systems/platforms** and a plurality of integration components facilitating the transfer of data having **different formats and/or data types** between the software applications. Independent claims 28 and 37 were amended to clarify that each software application has a different data format and/or data type, and that the integration components facilitate the transfer of data between the software applications. Applicants have further amended all independent claims to clarify that only those integration components and software applications for which the transfer of data would be affected by the change are identified and notified. Applicants respectfully submit that neither Brodsky nor any other art of record, taken individually or in combination, discloses or suggests the invention as now recited in the amended independent claims.

As for dependent claims 2-13, 15-27, 29-36, and 38-48, although they may recite independently allowable subject matter, these claims depend from independent claims 1, 14, 28, and 37, respectively, and are therefore allowable for at least the same reasons.

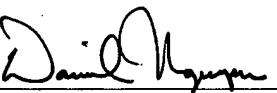
CONCLUSION

The rejection and objection raised by the Examiner have been addressed, and Applicants believe that the claims are now in condition for allowance, which action is respectfully requested. If any questions or issues remain and the resolution of which the Examiner feels will be advanced by a conference with the Applicants' attorney, the Examiner is invited to contact the attorney at the number noted below.

The Commissioner is hereby authorized to charge any additional fee which may be required, or credit any overpayment, to Deposit Account No. 10-0447, Reference No. 54357-00003USPT (DGN).

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Respectfully submitted,

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